

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
_____	:	

**UNOPPOSED MOTION TO SUBSTITUTE COUNSEL FOR DEFENDANT UNIVERSAL  
PROTECTION SERVICE LP d/b/a ALLIED UNIVERSAL SECURITY SERVICES**

Pursuant to Local Rule 83.2 of the Southern District of Texas, Jessica E. Chang brings this Motion to Substitute Counsel for Universal Protection Service, LP d/b/a Allied Universal Security Services (“Universal Protection Service, LP” or “Defendant”). In support of this Motion, Defendant respectfully shows the Court as follows:

1. Kelly Eisenlohr-Moul of Martenson, Hasbrouck & Simon LLP initially appeared as counsel of record on behalf of Universal Protection Service, LP.
2. Kelly Eisenlohr-Moul is no longer associated with Martenson, Hasbrouck & Simon LLP.
3. Universal Protection Service, LP requests that Jessica Chang of Martenson, Hasbrouck & Simon LLP, 500 Davis Street, Suite 1010, Evanston, IL 60201 be substituted in place as attorney of record for Defendant.

4. Universal Protection Service, LP will not be adversely affected by Ms. Eisenlohr-Moul's withdrawal as counsel because Jessica Chang is specifically authorized to practice in the Southern District of Texas and has represented Universal Protection Service, LP in prior cases.

5. Pursuant to Local Rule 11, Jessica Chang will be designated as attorney-in-charge substituting Kelly Eisenlohr-Moul.

6. Pursuant to Local Rule 7.1, counsel for Universal Protection Service, LP has informed the party affected by its relief requested of its intent to file this motion and Plaintiff is unopposed.

WHEREFORE, PREMISES CONSIDERED, Defendant Universal Protection Service, LP ask this Court to enter an Order withdrawing Kelly Eisenlohr-Moul and substituting Jessica E. Chang as its counsel of record and for such other and further relief, at law or in equity, to which Defendant may be justly entitled.

Respectfully submitted,

/s/ Jessica Chang

Jessica Chang

Southern District Bar No. 3905098

**Martenson, Hasbrouck & Simon LLP**

500 Davis Street, Suite 1010

Evanston, IL 60201

(224) 350-3127

jchang@martensonlaw.com

*Counsel for Defendant*

Dated: January 27, 2025

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that on January 24, 2024, the parties' counsel conferred by email and Plaintiff Twana Ahmed's counsel expressed that she is unopposed to Defendant's Motion to Substitute Counsel.

/s/ Jessica Chang  
Jessica Chang

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument was served upon all counsel of record listed below through the Court's ECF service system on the 27th day of January 2025:

Amanda C. Hernandez  
AH Law, PLLC  
5718 Westheimer, Suite 1000  
Houston, Texas 77057  
amanda@ahfirm.com

Amy Gibson  
David Wiley  
Gibson Wiley PLLC  
1500 Jackson Street, #109  
Dallas, Texas 75201  
amy@gwfirm.com  
david@gwfirm.com

/s/ Jessica Chang  
Jessica Chang